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May 4, 2016

Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

Re: Request for Waiver of Invoice Deadline Extension, CC Docket No. 02-6  
FRN 2648938, Form 471 # 960605  
Kennett Consolidated School District, SLD Entity # 126206  
Amount of Invoice: \$24,399.98

**Petition for Waiver of Invoice Deadline**

The Applicant, Kennett Consolidated School District, submitted online BEAR 2345322 for FRN 2648938 on February 17, 2016. The invoice deadline was February 25, 2016. After the Applicant's submission, there was no email notification sent to the service provider to inform us of the online BEAR filing and the need for the service provider online certification. On April 28, 2016, we discovered this online BEAR because we logged into the online BEAR filing system and discovered the BEAR and certified it then. Because it was after the invoice deadline, the BEAR was denied payment.

The Applicant should not be penalized because the online BEAR system failed to generate an email notification to us to advise that there was a BEAR waiting to be certified. Indeed, the E-rate BEAR notification letter recommends that applicants use the online filing system. And the Form 472 instructions state as follows:

If you are filing online: You [the Applicant] may complete, submit and certify the BEAR in the Apply Online section of our website. *The system is designed so that once you make the appropriate certifications, the service provider featured is notified that the BEAR is available for their review and online certification or response to you.* If you file a BEAR online, do not also mail a printed copy to USAC. (Emphasis added).

Applicants and Service Providers should be permitted to rely on the OMB-approved instructions set forth in the Form 472 and trust that the system will work properly. Indeed, even the BEAR notification letter encourages the use of the online BEAR system. Had we received our system-generated automated email of the BEAR submission – as we should have – per the FCC Form 472 instructions – we would have timely certified the form.

Because the Applicant timely submitted this BEAR form, the Commission should find that granting this waiver is in the public interest. For these reasons, the FCC should approve this waiver, and allow the Applicant to resubmit the BEAR form.

Respectfully submitted,

  
Dave Houseman, President